

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<i>In re BP plc Securities Litigation</i>	)	MDL 2185
	)	Case No. 4:10-md-02185
	)	
	)	<b>This Document Relates to Only The</b>
	)	<b>Following Individual Actions</b>
	)	
	)	No. 4:12-cv-1256 (cons.)
	)	No. 4:12-cv-1272
	)	No. 4:12-cv-2362 (cons.)
	)	No. 4:12-cv-3621
	)	No. 4:12-cv-3714
	)	No. 4:12-cv-3715
	)	No. 4:13-cv-0069
	)	No. 4:13-cv-0129
	)	No. 4:13-cv-0517
	)	No. 4:13-cv-0887
	)	No. 4:13-cv-1044
	)	No. 4:13-cv-1393
	)	No. 4:13-cv-3397
	)	No. 4:14-cv-0457
	)	No. 4:14-cv-0980
	)	No. 4:14-cv-1065
	)	No. 4:14-cv-1085
	)	No. 4:14-cv-1068
	)	No. 4:14-cv-1072
	)	No. 4:14-cv-1073
	)	No. 4:14-cv-1075
	)	No. 4:14-cv-1087
	)	No. 4:14-cv-1279
	)	No. 4:14-cv-1280
	)	No. 4:14-cv-1281
	)	No. 4:14-cv-1418
	)	

**[PROPOSED] ORDER GRANTING THE INDIVIDUAL ACTION PLAINTIFFS’  
MOTION TO COMPEL DISCOVERY RESPONSES**

Having considered the Motion filed by Plaintiffs from the above-captioned Individual Actions (“Plaintiffs”) for an Order pursuant to Fed. R. Civ. P. 29(b) and 37 and Civil L.R. 7.1 enforcing the parties’ March 21, 2017 Letter Agreement, and compelling Defendants named in

the above-captioned actions (“Defendants”) to provide certain discovery sought thereunder, and pursuant to Plaintiffs’ underlying Interrogatories and Document Requests, and for good cause therefor, the Court hereby enters the following Order:

1. Within 10 days, Defendants shall provide complete responses to Plaintiffs’ Interrogatories 1, 3, 9, and 11;

2. Within 10 days, Defendants shall identify all custodians from the parallel ADS-only class action for use in discovery in Plaintiffs’ lawsuits;

3. For purposes of performing custodial document searches, Defendants shall use Plaintiffs’ Appendix C custodians list, as it may be augmented by any additional custodians identified through the measures ordered in the preceding ¶¶1-2;

4. Defendants shall run Plaintiffs’ “Appendix B” searches as written, including date ranges set forth therein, on these custodians, on Defendants’ “central repository,” and on any additional locations with potentially responsive documents, to produce all documents regarding all direct communications between BP and Plaintiffs or their outside investment managers, whether or not alleged in any complaint; and

5. Defendants shall run Plaintiffs’ “Appendix A” searches as written, including date ranges set forth therein, on these custodians, on Defendants’ “central repository,” and on any additional locations with potentially responsive documents, to produce all non-duplicative documents regarding all misstatements alleged in Plaintiffs’ complaints, whether dismissed or upheld as actionable, and whether or not alleged in the parallel ADS-only class action.

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE KEITH P. ELLISON  
UNITED STATES DISTRICT JUDGE